

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN
MCDONALD, and THE ESTATE OF CHERRIGALE
TOWNSEND,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED
SHEERAN, ATLANTIC RECORDING
CORPORATION, d/b/a ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC, and
WARNER MUSIC GROUP CORPORATION, d/b/a
ASYLUM RECORDS

Defendants.

ECF CASE

17-cv-5221 (LLS)

**DECLARATION OF
ILENE S. FARKAS
IN SUPPORT OF DEFENDANTS'
FIRST MOTION *IN LIMINE***

I, Ilene S. Farkas, declare as follows:

1. I am a member of Pryor Cashman LLP, counsel for defendants Edward Christopher Sheeran ("Sheeran"), Atlantic Recording Corporation d/b/a Atlantic Records ("Atlantic") and Sony/ATV Music Publishing LLC ("SATV," together with Sheeran and Atlantic, the "Defendants"). I have personal knowledge of, and am fully familiar with, the facts set forth in this Declaration, which I respectfully submit in support of Defendants' First Motion *In Limine*.

2. Annexed hereto as **Exhibit 1** is a true and correct copy of the "Application for Registration of a Claim to Copyright" for the LGO Composition (as defined in the accompanying memorandum of law), which the Copyright Office proceeded to register under EP 314589 and which was produced by Plaintiffs in response to "Defendants' First Request For Production Addressed To Plaintiffs By Defendants Edward Christopher Sheeran, Atlantic Recording Corporation And Sony/ATV Music Publishing LLC."

3. Annexed hereto as **Exhibit 2** is a true and correct copy of the deposit copy of the LGO Composition, which I caused to be procured from the U.S. Copyright Office. This Exhibit is a copy of what is annexed to Exhibit 1, but this Exhibit is in color and more legible.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 21, 2019



ILENE S. FARKAS